

The Honorable Lauren King

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

NO. 2:25-cv-00244-LK

DECLARATION OF S.M.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, S.M., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I have chosen to submit this declaration using only initials because I am fearful
5 that the government could retaliate against me or my child. I also worry that individuals
6 emboldened by the Federal Government's recent actions could target my family for submitting
7 this declaration.

8 3. I am a freelance writer and radio producer and a life-long Washingtonian. I am
9 the mother of a 17-year-old daughter, who in this declaration I will be referring to as "Minor A."
10 She's my only child. My ex-husband is a retired software engineer, and we co-parent our
11 daughter in a city north of Seattle.

12 4. My daughter is transgender. She was assigned male at birth, but she identifies as
13 female. She loves to play electric guitar and dreams of being a star guitarist one day. She's very
14 creative, loves drawing and playing Dungeon & Dragons with her friends. She's an outgoing
15 social kid who has lots of friends in school and in our neighborhood. We hear from parents of
16 cisgender kids the challenges they have raising their teenagers, but ours has never given us that
17 kind of trouble. We find it easy to raise her even though we know teenage years can be
18 challenging.

19 5. When Minor A was around three years old and able to put in words what she
20 preferred, she started making it very clear to us that she was a girl. She found a Tinkerbell
21 nightgown at home and wanted to wear it day and night. If she got ahold of something pink, she
22 would not let go of it. When we went shopping, she'd drag me to the girls' section and chose
23 stereotypically feminine toys and clothes. She'd have horrible tantrums whenever I insisted that
24 she should wear pants or boy's clothes to go out of the house.

25 6. Around this age, she put it clearly in words to me. She said: "Momma, something
26 went wrong in your tummy when you were pregnant, that made me come out as a boy. I had to

1 be a girl. Can you put me back in so I can come out as a girl.” Take into consideration that this
2 happened almost fifteen years ago. At the time, I did not know any transgender people and didn’t
3 even know that it was possible to have a transgender child. But this statement and her preferences
4 were so consistent, that I started researching and speaking with doctors and specialists about
5 what it meant to have a transgender child. She was four years old when we fully started treating
6 her and raising her as a girl.

7 7. We took our daughter to see a psychologist at Seattle Children’s Hospital (SCH),
8 to get support during her transition. We went to SCH to see what type of care was available for
9 a transgender child. We talked to her pediatrician, who said he had never had a transgender
10 patient before and told us he needed to do some research before he could make recommendations.
11 The only help offered to us at SCH was a psychologist that our daughter started consulting with.
12 It was very difficult finding appropriate professional care for our daughter, as, at that time, there
13 were very few medical and mental health professionals experienced in the care of transgender
14 children. .

15 8. When Minor A was around 11 years old, her doctors started monitoring her to
16 decide when the appropriate age was to start puberty blockers. When she was 12, the doctors
17 recommended a blocker implant. At 13, my daughter saw how her friends were going through
18 puberty and starting to look like women. She wanted to be on par with her friends’ development,
19 and she started taking hormones. Supporting her medical transition was not a hard decision for
20 us as parents. By this point, she had been so certain of her gender identity for years that getting
21 her access to puberty blockers and hormones was to us what getting insulin is to parents of a
22 diabetic child.

23 9. Minor A is now 17 and looking forward to being able to get the surgery that aligns
24 with her gender identity. We got a referral for SCH so she could see a surgeon and get on the
25 long waitlist to get surgery. We tried to follow up on this referral and make an appointment, but
26 the hospital has not gotten back to us. This happened around the time The President’s Executive


1 Order (E.O.) regarding gender affirming care was issued. We've heard gender affirming
 2 surgeries for trans kids have been cancelled at SCH, and we fear that's the reason we haven't
 3 heard back from them.

4 10. The E.O. has hit us like a ton of bricks. We're scared that Minor A's doctors
 5 won't be able to prescribe estrogen any longer. I've also done some research into which country
 6 we could travel to get her the bottom surgery she'll need, if the hospitals here stop performing
 7 them. This experience is exhausting for us as parents of a transgender child. I'm not eating or
 8 sleeping as I used to, worrying about what it would take for me to keep my daughter safe, figuring
 9 out passports or logistics for traveling to get her medical care. It feels like we're being bullied
 10 by our government.

11 11. I try to shield Minor A from these worries. I tell her I'll keep her updated if there
 12 are any important changes she needs to know about. I reassure her that we're going to get her
 13 treatment done one way or the other. But she's savvy, she perceives the stress it's causing on her
 14 parents. I've noticed that her mood has been down lately, and I suspect it has to do with the
 15 Federal Government actions that are treating her like a second-class citizen, like she doesn't
 16 deserve equal treatment because of who she is.

17 I declare under penalty of perjury under the laws of the State of Washington and the
 18 United States of America that the foregoing is true and correct.

19 DATED this 17 day of February 2025.

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 21 
 22 S.M.
 23 Parent of "Minor A"
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